

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

Edward Butowsky,

Plaintiff,

v.

Case No. 4:19-cv-00577

Douglas H. Wigdor, et al.,

Defendants

MOTION FOR STAY

NOW COMES Edward Butowsky, the Plaintiff, moving the Court to stay the proceedings and deadlines in this case for 45 days:

Plaintiff's Counsel has been gradually withdrawing from a prescription medication since May, and at times he has experienced severe withdrawal symptoms.¹ See August 10, 2020 Letter from Jianne Lo to The Hon. Catherine D. Purcell (Exhibit 1). The symptoms were particularly bad last week and continued through the weekend. Yesterday, Plaintiff's Counsel consulted with his medical provider and decided to enter an intensive outpatient program on September 2, 2020. The program is expected to last 3-4 weeks, therefore the Plaintiff moves the Court to stay proceedings in this case for 45 days. The Plaintiff's amended pleadings are due on September 2, 2020, and the Plaintiff moves the Court to stay that deadline as well insofar as Plaintiff's Counsel was unable to

¹ As witnessed by his electronic signature on this document, Ty Clevenger declares under penalty of perjury under the laws of the United States that his statements in this motion are true and correct.

work on them last week. This case has not moved past the pleadings stage, therefore a stay should not cause any prejudice to the Defendants.

Respectfully submitted,

/s/ Ty Clevenger

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CERTIFICATE OF CONFERENCE

At 7:25 p.m. CT on August 31, 2020, I emailed Adam Nunallee (anunnallee@dykema.com) and Christopher Kratovil (ckratovil@dykema.com) to determine whether the Defendants would oppose this request for a stay. They had not responded as of the afternoon of September 1, 2020, so I attempted to contact each of them by telephone around 2:30 p.m. CT. I did not connect with either of them, but I left voicemails for both of them. As of this filing, they have not indicated whether the Defendants intend to oppose this motion.

/s/ Ty Clevenger

Ty Clevenger

CERTIFICATE OF SERVICE

I certify that a copy of this document was filed electronically with the Court's ECF system on September 1, 2020, which should result in automatic notification to all counsel of record.

/s/ Ty Clevenger
Ty Clevenger